

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ULYSSES RODRIGUEZ CHARLES,  
Plaintiff

V.

CITY OF BOSTON, et al.  
Defendants

04-CV-10986-NG

**DEFENDANTS' MOTION FOR ORDER COMPELLING DISCLOSURE  
OF CRIMINAL OFFENDER RECORD INFORMATION**

Defendants hereby move for an Order compelling the disclosure of Defendants' deposition witness, Plaintiff Ulysses Rodriguez Charles. As grounds therefore, Defendants submit that they re-noticed the taking of the Plaintiff's deposition on May 15, 2008 for said deposition to be taken on June 30, 2008. Upon information and belief the Plaintiff is presently in the custody of either the Massachusetts Department of Correction or the Suffolk County Sheriff. Defendants respectfully request that the CORI order be allowed so that they may properly submit a motion to the court for leave to depose the Plaintiff as required under Fed.R.Civ.P. 30(a)(2)(B) and to provide adequate opportunity to access certified copies of arrest, criminal charge and conviction, if any, of the aforementioned witness.

Respectfully submitted,  
Attorneys for the Defendants,  
The City of Boston  
and Stanley Bogdan,

/s/ John P. Roache  
John P. Roache (BBO#421680)  
Patrick J. Donnelly (BBO#651113)  
Roache & Associates, P.C.  
66 Long Wharf  
Boston, Massachusetts 02110  
Tel: (617) 367-0330  
Fax: (617) 367-0172

Dated: May 20, 2008

CERTIFICATE OF SERVICE

I, John P. Roache, hereby certify that on May 20, 2008, I served a copy of the above upon counsel of record by filing with the ECF/Pacer Case Management System.

/s/ John P. Roache  
John P. Roache

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

_____	)	
ULYSSES RODRIGUEZ CHARLES,	)	
Plaintiff	)	
	)	
v.	)	
	)	04-CV-10986-NG
CITY OF BOSTON, et al.	)	
Defendants	)	
_____	)	

**ORDER FOR CRIMINAL AND PROBATION RECORDS**

Upon leave of Court, access is granted to counsel for the Defendants, John P. Roache and Patrick J. Donnelly, Roache & Associates, P.C., 66 Long Wharf, Boston, Massachusetts 02110 (for Defendants Stanley Bogdan and the City of Boston), to obtain certified copies of all criminal records, and all documents related thereto, of the individual identified on Exhibit A (attached).

By the Court,

\_\_\_\_\_

Dated: \_\_\_\_\_, 2008

**EXHIBIT A TO DEFENDANTS' MOTION FOR DISCLOSURE  
OF CRIMINAL OFFENDER RECORD INFORMATION**

1. **Ulysses Rodriguez Charles**  
(a/k/a as follows: Ulysses R. Charles, Ulysses Rodriques Charles, Rodriguez Charles, Rodriguez U. Charles, Rodriguez V. Charles, Rod Charles, Rodreguez Trevor Charles, Trevor Charles, Charles Rodriguez and Carlos Rodriguez)

**Social Security Number:** [REDACTED]  
(Other possible SSN's used by witness in past: [REDACTED]  
[REDACTED] and 0 [REDACTED])

**Date of Birth:** [REDACTED]  
(Other possible d/o/b used by witness in past: 0 [REDACTED])